

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<i>In re:</i> KrisJenn Ranch LLC, <i>Debtor</i>	§ § § §	Chapter 11 Case No. 20-50805-rbk
<hr style="width: 40%; margin-left: 0;"/>		
KRISJENN RANCH, LLC, ET AL Plaintiffs,	§ § §	Adversary No. 20-05027-RBK
vs.	§ § §	
DMA PROPERTIES, INC, ET AL, Defendants.	§ §	

**WRIGHT’S MOTION REQUESTING EXPEDITED CONSIDERATION OF MOTION
TO VACATE OR SET ASIDE ANY RULING OR ORDER GRANTING MOTION TO
ENFORCE CONSTRUCTIVE TRUST**

WRIGHT HAS REQUESTED EXPEDITED CONSIDERATION OF HIS MOTION AND HAS REQUESTED THAT A HEARING BE HELD AT THE COURT’S EARLIEST CONVENIENCE. IF THE COURT IN FACT SETS THIS OBJECTION FOR AN EXPEDITED HEARING, THEN ONLY ATTENDANCE AT THE HEARING IS NECESSARY TO PRESERVE YOUR RIGHTS.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Larry Wright (“Wright”) submits this Motion Requesting Expedited Consideration of Wright’s Motion to Vacate Or Set Aside Any Ruling Or Order Granting Motion To Enforce Constructive Trust (Doc. 382), and in support thereof respectfully shows the Court as follows:

1. The Court heard Defendants’ Motion to Enforce Constructive Trust (Doc. 368, 377) on February 5, 2025. The Court indicated that it would grant the Motion to Enforce to direct Wright and others to transfer property to Defendant and disgorge any profit interest.

2. On February 14, 2025, Wright filed his Wright's Motion to Vacate Or Set Aside Any Ruling Or Order Granting Motion To Enforce Constructive Trust (Doc. 382). For the reasons stated therein, Wright objects to the Court's ruling on February 5 and any entry of an order consistent with this ruling.

3. For good cause, Wright requests expedited consideration of its Motion to Vacate because time is of the essence. The Court should consider the Motion to vacate on an expedited basis for at least the following reasons:

- a. The Court asked Defendants' counsel to submit an order in conformance to its bench ruling within 14 days by February 19, 2025.
- b. Defendants' proposed order directs Wright to transfer "all rights, title, and interest in the ROW to DMA within **twenty-one (21) days** of this order."
- c. The proposed order granting the Motion to Enforce amends the Final Judgment, which is on appeal to the District Court. The appellate matter is fully briefed and ready for the District Court's judgment.

WHEREFORE, PREMISES CONSIDERED, Larry Wright respectfully requests that the Court grant this request and set his Motion to Vacate (Doc. 382) to be heard at the Court's earliest convenience.

Dated: February 14, 2025

[###]

Respectfully submitted,

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ATTORNEY FOR LARRY WRIGHT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record by way of e-service through the CM/ECF system by notice of electronic filing or via email on the 14th day of February 2025:

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**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	
KrisJenn Ranch LLC,	§	Chapter 11
<i>Debtor</i>	§	Case No. 20-50805-rbk
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KRISJENN RANCH, LLC, ET AL	§	Adversary No. 20-05027-RBK
Plaintiffs,	§	
	§	
vs.	§	
	§	
DMA PROPERTIES, INC, ET AL,	§	
Defendants.	§	

ORDER GRANTING WRIGHT’S MOTION FOR EXPEDITED HEARING

On this date came on for consideration the Motion filed by Larry Wright (“Movant”) requesting an expedited hearing on **Wright’s Motion To Vacate of Set Aside Any Ruling Or Order Granting Motion To Enforce Constructive Trust**, filed on February 14, 2025 [Docket No. 382]. The Court finds that the Motion should be granted.

IT IS, THEREFORE, ORDERED that **Wright’s Motion To Vacate Any Ruling Or Order Granting Motion To Enforce Constructive Trust** is scheduled for expedited hearing on

_____.

[###]

Respectfully submitted,

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